

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

RE: Zak Shaik v. Bay Mountain Capital LLC, et al.

Civil Action No.: 3:25-cv-703-B-BW

SUPPLEMENTAL DECLARATION IN SUPPORT OF APPLICATION TO PROCEED IN
FORMA PAUPERIS

DECLARATION UNDER 28 U.S.C. § 1746

I, **Zak Shaik**, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge:

1. I am the Plaintiff in the above-captioned matter and I submit this supplemental declaration in support of my **Application to Proceed In Forma Pauperis** (AO 239), in compliance with the Court's March 26, 2025 Order.
2. I am the same individual who previously transacted with Defendants using the name "**Zia Shaikh**", which appears on relevant documents and loan contracts. For all purposes in this case, both names refer to me, and I am the real party in interest.
3. I currently do not have sufficient income or assets to prepay the full filing fee of \$405. As explained in my AO 239 application, my rental properties have become largely vacant due to the economic downturn and damage caused by Defendants' conduct, including the wrongful disbursement of lien funds and excessive loan charges which triggered tenant departure and refinancing strain.
4. I am not currently receiving regular income and have no salaried employment. My properties are underperforming, and new rental offers are substantially below pre-refinance market rates. I do not receive public assistance and have no liquid savings.
5. The financial hardship described is **not voluntary** or temporary. It directly stems from the misconduct of the Defendants, whose actions have materially impaired my ability to maintain consistent rental income and caused unexpected escrow increases, legal expenses, and property carrying costs.
6. I respectfully ask the Court to consider this factual context as part of my poverty affidavit. **Requiring full payment at this stage would effectively deny me access to the court system**, contrary to the Supreme Court's instruction in **Griffin v. Illinois**, 351 U.S. 12 (1956), that "[t]here can be no equal justice where the kind of trial a man gets depends on the amount of money he has."
7. I am willing to provide additional documentation (bank statements, rent rolls, correspondence, hardship letters) if the Court deems them necessary to evaluate my financial condition.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: April 01, 2025

ZAK SHAIK

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